

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

HLV, LLC, a Michigan limited liability
company, LANDWORTHY CONTAINER,
LLC, a Michigan limited liability company,
and ROBERT BAKER, an individual,

Plaintiffs,

-vs-

Case No: 1:13cv1366PLM
Honorable Paul L. Maloney

VAN BUREN COUNTY, a municipal
corporation, VILLAGE OF PAW PAW,
a municipal corporation, PAGE & STEWART,
an ad hoc professional partnership, KELLY
PAGE, an individual, GARY STEWART, JR.,
an individual, PAUL HAMRE, an individual,
PEGGY GROTE, an individual, MICHAEL
MCKAY, an individual, and MICHAEL
BEDFORD, an individual,

Defendants.

Donald R. Visser (P27961)
Brittany Ward Burke (81438)
VISSER AND ASSOCIATES PLLC
Attorney for Plaintiffs

J. Nicholas Bostic (P40653)
BOSTIC & ASSOCIATES
Attorney for Plaintiffs

James H. Koning (P31622)
KONING & JILEK
Attorney for Defendant Page & Stewart

Robert A. Callahan (P47600)
PLUNKETT COONEY
Attorney for Defendant Gary Stewart

Donald D. Campbell (P43088)
Colleen H. Burke (P63857)
Trent B. Collier (P66448)
COLLINS EINHORN FARRELL
Attorneys for Kelly Page

BRIEF IN SUPPORT OF DEFENDANT STEWART'S EMERGENCY
MOTION FOR PROTECTIVE ORDER

Defendant, Gary Stewart, through counsel, has been advised co-Defendant Page and
"Page & Stewart" have settled with Plaintiff. That settlement is not the subject of any

confidentiality agreement. Plaintiff demonstrated a strong propensity in the *HLV v. ELC* Collection Action to communicate with television and print media regarding events that occurred in that lawsuit. Defendant Gary Stewart is justifiably concerned that publications or communications to the press, or in any manner outside of this lawsuit, could be made prior to trial in this matter. Any publications of settlement outside of trial in this matter could be heard by potential jurors. It is respectfully submitted that until trial in this matter is completed, that a protective order be issued precluding Plaintiff from communicating or broadcasting the fact of settlement or the amount of settlement with Defendants Kelly Page and "Page & Stewart" alleged entity.

Dated April 13, 2018

Respectfully submitted,

PLUNKETT COONEY

By: /s/ Robert A. Callahan
Robert A. Callahan (P47600)
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